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Debtors and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

EASTERDAY RANCHES, INC., et al.,¹

Debtors.

No. 21-00141-WLH11

**STIPULATION BY AND BETWEEN
DEBTOR EASTERDAY FARMS AND
MACK FINANCIAL REGARDING
MOTION FOR RELIEF FROM STAY**

¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc., (21-00141-WLH11) and Easterday Farms, a Washington general partnership (21-00176-WLH11).

STIPULATION BY AND BETWEEN DEBTOR
EASTERDAY FARMS AND MACK FINANCIAL
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Debtor Easterday Farms, a Washington General Partnership ("Farms") and Mack Financial Services, a division of VFS US LLC ("Mack Financial" and, together with Farms, the "Parties"), by and through their undersigned counsel of record, hereby enter into this stipulation and agreed order (the "Stipulation"), pursuant to which the Parties stipulate and agree as follows:

WHEREAS, on April 21, 2021, Mack Financial filed a *Motion for Relief from Stay* [Docket No. 603] (the "Motion"), seeking, *inter alia*, relief from stay to obtain possession of certain equipment.

WHEREAS, the Debtor made certain payments to Mack Financial since the Motion was filed.

WHEREAS, the Parties seek time to resolve the Motion without further litigation.

Based on the foregoing recitals, the Parties hereby stipulate and agree as follows:

1. The Parties agree that the Debtor is not required to file a response to the Motion at this time. Mack Financial agrees that it will not seek entry of an Order granting relief from stay with respect to the Motion other than on the timeline set forth below.

2. The Parties stipulate that, to the extent necessary, the Parties will request that the court may hold a status conference on the Motion at the May 19, 2021, omnibus hearing calendar in this case. The Parties further stipulate that any such status conference would be held to determine (i) a future hearing date for the Motion; and (ii) resetting the deadline by which the Debtor would be required to respond to the Motion.

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1 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD**

2
3 DATED May 10, 2021

BUSH KORNFELD LLP

4 /s/ Thomas A. Buford

5 THOMAS A. BUFORD, III (WSBA 52969)
6 BUSH KORNFELD LLP

7 RICHARD M. PACHULSKI (Admitted *Pro Hac Vice*)
8 JEFFREY W. DULBERG (Admitted *Pro Hac Vice*)
9 JASON H. ROSELL (Admitted *Pro Hac Vice*)
10 PACHULSKI STANG ZIEHL & JONES LLP
11 Attorneys for the Debtor

12 DATED May 10, 2021

GORDON REES SCULLY MANSUKHANI, LLP

13 /s/ W. GREGORY LOCKWOOD

14 W. GREGORY LOCKWOOD (WSBA 52232)
15 GORDON REES SCULLY MANSUKHANI, LLP

16 Attorneys for Mack Financial
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